Appendix E Status of Recommendations from Prior 5-year Reviews

# Status of Recommendations from Prior 5-year Reviews for Atlas and Coalinga Asbestos Mine (Johns-Manville Mill) Superfund Sites

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The purpose of this technical memorandum is to summarize the status of recommendations from prior 5-year reviews for the Atlas and Coalinga Asbestos Mine Superfund Sites in Fresno County, California. The previous (first) 5-year review for the Atlas Asbestos Mine Site was completed in 2001. The results of that review are documented in the *Final First Five-Year Review Report for Atlas Asbestos Mine Site* (USEPA 2001a). The previous (second) 5-year review for the Coalinga Asbestos Mine Site was completed in 2001. The results of that review are documented in the *Final Second Five-Year Review Report for Coalinga Asbestos Mine Superfund Site*, Coalinga (USEPA 2001b).

## Site Background

The Atlas Asbestos Mine Superfund Site consists of two operable units (OU) and two geographic areas. The Coalinga Asbestos Mine Superfund Sites consists of two OUs. The Atlas Asbestos Mine Superfund Site consists of the Atlas Mine Area OU (OU1), City of Coalinga OU (OU2), the Clear Creek Management Area (CCMA), and the Arroyo Pasajero Ponding Basin (Ponding Basin). The CCMA and Ponding Basin geographic areas were previously evaluated with the Atlas Asbestos Mine Superfund Site because of concerns that asbestos mining and milling waste from the Atlas Mine Area were being transported to these areas by water or wind. The Coalinga Asbestos Mine Site consists of the Johns-Manville Mill (JMM) OU (OU1) and the previously mentioned City OU (OU2), which is considered part of the Coalinga Asbestos Mine Site due to historic operations.

This memorandum is organized into the following sections: Atlas Mine Area OU, JMM OU, and the City OU. Recommendations made in the previous 5-year review report and a summary of the status of those recommendations for each OU will also be discussed.

#### Atlas Mine Area OU

Recommendations identified for the Atlas Mine in the *Final First Five-Year Review Report for Atlas Asbestos Mine Site* (USEPA 2001a) include:

- 1. Repair road or find another route to access Pond A area.
- 2. Perform a study to determine the best means of addressing eroding soil at the erosion prone area near the Regional Sediment Storage Area.

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- 3. Perform more frequent maintenance of revegetation site.
- 4. Place deed restrictions on property and develop Access Control Agreement.

The first two recommendations were largely addressed during the construction maintenance activities performed in the spring of 2005. Among other maintenance activities, the road to Pond A and the gullies on the outboard slope of the tailings pile south of the Regional Sediment Storage Area were repaired during 2005.

Two portions of the road to Pond A were addressed. Adjacent to the Pond B highwall, the road was repaired and re-graded to change the super-elevation to slope toward the drainage ditch. The drainage ditch was regraded and lined with Reno mattresses for stabilization. In the second location, berms were established at the existing diversion channel between the Pond B highwall and Pond A to prevent runoff to the road. These repairs will prevent surface water from further eroding the access roadway towards Pond A area. An alternate route to access Pond A, the second component of Recommendation 1, has not been identified.

At the outboard slope of the tailings pile south of the Regional Sediment Storage Area, four gullies were repaired in the following ways:

- Buttresses were placed on top of each of the gullies with rip rap underlain by filter fabric.
- A subsurface drain was constructed beneath the flow lines of each gully so water can exit after the velocity has been reduced by the rip rap energy dissipaters.
- Berms at the top of the tailings pile slope were constructed to direct surface water in the vicinity of the gullies toward the gullies.

These repairs were designed to prevent further erosion from occurring in the existing gullies and reduce the potential for additional gullies from forming.

Since the last 5-year review, Recommendation 3, more frequent maintenance of revegetation, was not performed. However, in an April 2002 e-mail to an Atlas Representative (George Robinson, R2 Inc.), Shea Jones, the United States Environmental Protection Agency (USEPA) remedial project manager (RPM) decided that further revegetation efforts would not be required. This decision was based on a consideration of the very limited success of the \$1.5 million revegetation pilot program. In June 2006, this decision was reaffirmed in a teleconference that included representatives of Northrop Grumman (Elizabeth Brown), Department of Toxics Substances Control (DTSC) (Steve Ross), Bureau of Land Management (Tim Moore), and USEPA (Lynn Suer, RPM). It was also decided that vegetation will continue to be monitored during inspections. If large disturbances to existing vegetation are observed (e.g., due to severe storms or earthquakes), re-vegetation efforts may be re-considered. Site inspections indicate that natural revegetation processes are occurring and these will likely provide a self-sustaining vegetative cover over the long term. The original re-vegetation effort was successful in that it provided the source material for these natural processes.

Recommendation 4 has not been implemented. DTSC has responsibility for this action, because the 1992 Consent Decree for the Atlas Mine Area OU does not require the settling

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parties to record deed restrictions. DTSC is currently working with Northrop Grumman to develop the deed restriction for their privately owned property at the Atlas Mine Area.

#### Johns-Manville Mill OU

No recommendations or follow-up actions were specified for the JMM OU in the *Final Second Five-Year Review Report for Coalinga Asbestos Mine Superfund Site, Coalinga* (USEPA 2001b). No activities or changes in status have occurred at the site other than routine operation and maintenance activities.

## City OU

Recommendations identified for the City OU in the Final First Five-Year Review Report for Atlas Asbestos Mine Site (USEPA 2001a) and the Final Second Five-Year Review Report for Coalinga Asbestos Mine Superfund Site, Coalinga (USEPA 2001b) include:

- 1. Repair animal burrows found at the Waste Management Unit (WMU) cap.
- 2. Repair damaged signs

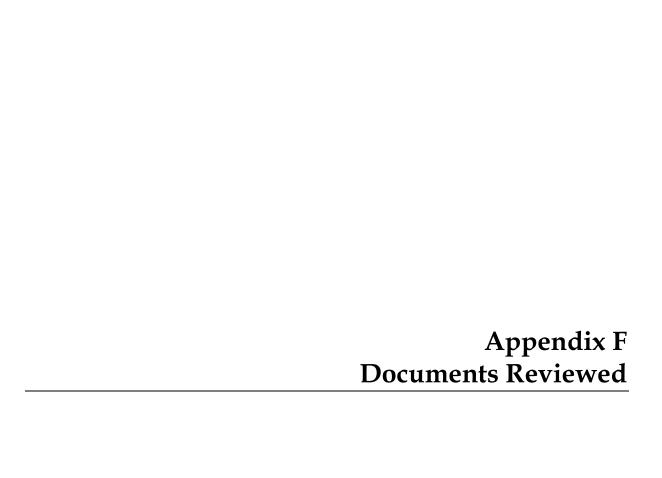
Both recommendations were completed during regular operation and maintenance activities since the last 5-year review. In addition, in October 2005, fencing material with a smaller screen size was added to the lower 3 feet of the perimeter fence and extended approximately 3 feet below ground to prevent small animals from entering the site and burrowing into the cap of the WMU. Based on observations made during the most recent site inspection (2006), the additional fencing resulted in a decrease of the number of burrows found in the cap of the WMU.

#### References

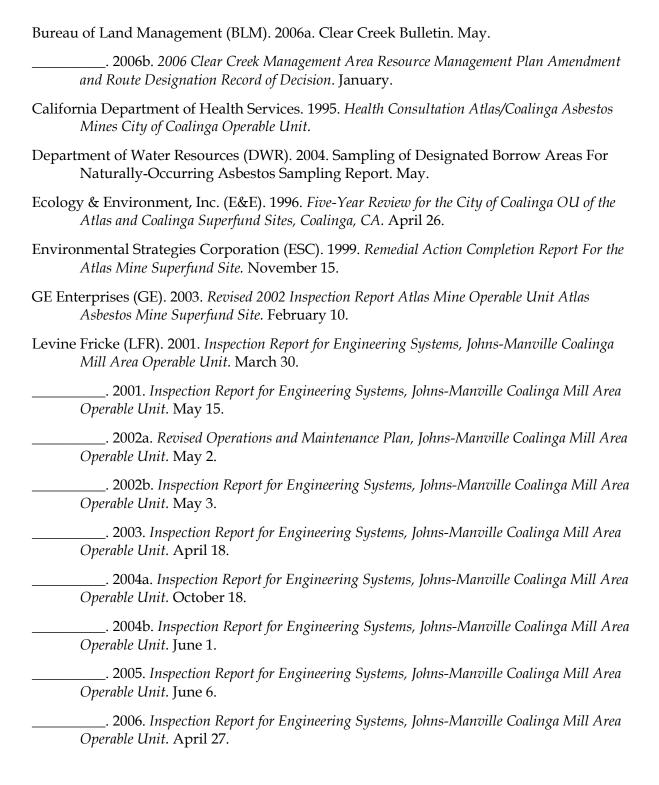
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